

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	Case No.: 1:19-cr-00552-GHW
	:	
Plaintiff,	:	
	:	
v.	:	NOTICE OF MOTION
	:	
EDWARD SHIN,	:	
	:	
Defendant.	:	

TO: Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Assistant U.S. Attorney Tara LaMorte
United States Attorney's Office
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

Assistant U.S. Attorney Daniel Tracer
United States Attorney's Office
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

Sirs and Madam:

PLEASE TAKE NOTICE that on July 31, 2020 at 3:00 p.m. or at another time and date to be set by the Court, Defendant Edward Shin by his counsel Paul B. Brickfield, Esq. of Brickfield & Donahue will move for the following relief:

1. The provision of a bill of particulars;
2. The suppression of all evidence and fruits thereof obtained pursuant to the execution of the search and seizure warrant at Mr. Shin's office;
3. Early production of Jencks and Giglio material 60 days before trial;
4. Leave of Court to file additional motions based on the Government's continuing discovery obligations.

A Memorandum of Law and Certification of Paul B. Brickfield, Esq. pursuant to Local Criminal Rule 16.1 is submitted in support of this motion.

Respectfully Submitted,



Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue, Suite 100
River Edge, NJ 07661
(201) 488-7707

/s/ Robert J. Basil, Esq.

Robert J. Basil, Esq.
The Basil Law Group, P.C.
32 East 31st Street, 9th Floor
New York, NY 10016
(917) 994-9973

Counsel for Defendant Edward Shin

Dated: June 8, 2020